

# **EXHIBIT 1**

## **Excerpt of Deposition of Edward Blum**

Students for Fair Admissions, Inc. v. UNC at Chapel Hill, et al.  
Edward Blum on 05/12/2017

30(b)(6)

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
3                   CASE NO.: 1:14-CV-954  
4                   -----X  
5                   STUDENTS FOR FAIR ADMISSIONS, :  
6                   INC., :  
7                   Plaintiff, :  
8                   v. :  
9                   THE UNIVERSITY OF NORTH :  
10                  CAROLINA AT CHAPEL HILL, :  
11                  et al., :  
12                  Defendants. :  
13                  -----X  
14  
15                   SUBJECT TO CONFIDENTIALITY AND PROTECTIVE ORDER  
16  
17                   DEPOSITION OF EDWARD BLUM, INDIVIDUALLY  
18                   AND AS THE RULE 30(B)(6) DESIGNEE OF  
19                   STUDENTS FOR FAIR ADMISSIONS, INC.  
20                   (Taken by Defendants)  
21                   Charlotte, North Carolina  
22                   May 12, 2017  
23  
24                  Reported by: Dayna H. Lowe  
25                                  Court Reporter  
                                Notary Public

1 and he has been very ill and resigned as a board member  
2 when he was in the hospital. When he was released from  
3 the hospital, he expressed an interest to stay on the  
4 board, so we sort of left that position open for him.  
5 He has subsequently not been able to participate in  
6 board meetings, so we consider him no longer a board  
7 member.

8 Q. Okay. Are members of the organization offered  
9 an opportunity to vote on anything beyond the member  
10 director?

11 A. No.

12 Q. Are there any -- are there any committees or  
13 subcommittees of the board that have been established?

14 A. No.

15 Q. Are there any member-based committees that  
16 have been established?

17 A. No.

18 Q. Do you know whether a member has any right to  
19 suggest the removal of a director and to participate in  
20 the removal of a director?

21 A. They don't have a right, but we would -- we're  
22 always interested and consider the recommendations that  
23 our members make in any of our activities.

24 Q. What process would you follow if a member  
25 suggested the removal of a director?